

Exhibit C



Deposition of:
Derek Muehrcke , M.D.

July 24, 2017

In the Matter of:

**In Re: Bard IVC Filters Products
Liability**

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1 apologize for being a little slow here.

2 Q The sixth line down on the second paragraph.

3 The first complete paragraph on that page.

4 A Yes. She's also at risk of her Eclipse filter
5 fragment to perforate her pulmonary artery.

6 Q She now remains at high risk for PE. Are you
7 on page 8?

8 A Yeah.

9 Q The paragraph that begins: Mrs. Jones suffered
10 pain...

11 A Suffered pain, yes.

12 Q Go down six lines.

13 A She is also at risk for her Eclipse filter
14 fragmentation to perforate her pulmonary artery.

15 Q The sentence before that.

16 A Okay.

17 Q She now remains at high risk for PE.

18 That is what you said; correct?

19 A Yes, yes.

20 Q What's your basis for saying that?

21 A Well, her history of DVT's and PE's and her
22 contraindication of anticoagulation, and the loss of a
23 -- her filter's not in place.

24 Q Do you know whether any physician has
25 recommended her to have another filter implanted?